

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

H.M. & I.B.,

Plaintiffs,

v.

RADHESHVAR, LLC, d/b/a  
SUPER 8,

Defendant.

CIVIL ACTION FILE

NO. 1:24-cv-4041-TWT

**CONSENT MOTION TO EXTEND THE DISCOVERY PERIOD**

Pursuant to Rule 6 of the Federal Rules of Civil Procedure, the parties move this Court to extend the discovery period showing this honorable Court as follows:

1.

This lawsuit arises from allegations that Plaintiffs were trafficked for sex when they were 18 years old at the Super 8 located at 2822 Chamblee Tucker Road, Atlanta, Georgia 30341.

2.

The discovery period commenced on November 8, 2024.

3.

The parties have worked together in good faith to streamline and conduct discovery in two cases (this case and *H.M. and I.B. v. Radheshvar, LLC d/b/a Motel 6*, 1:24-cv-04039) in the most efficient way possible. In doing so, the parties have

exchanged written discovery, documents and have been working to schedule depositions of the party witnesses.

4.

Counsel for both parties are scheduled for trial before the Honorable Judge J.P. Boulee in the Northern District of Georgia, Atlanta Division (*D.H. v. Tucker Inn, Incorporated*, Case No. 1:22-cv-03419). This trial commences on July 21, 2025.

5.

Additionally, counsel for Plaintiffs also are scheduled to commence a second trial before the Honorable Judge Sarah E. Geraghty in the Northern District of Georgia, Atlanta Division (*J.G. v. Northbrook Industries, Inc.*, 1:20-cv-05233-SEG). This trial commences on July 7, 2025.

6.

Both scheduled trials have numerous deadlines and pretrial conferences in the month of June.

7.

As the Court is aware this lawsuit involves allegations of sex trafficking, and accordingly, the materials exchanged in discovery are intensive and the parties are working to take numerous depositions of witnesses, law enforcement officials, and expert witnesses.

8.

Due to the demanding nature of two sex trafficking trials in July, the parties conferred and agreed that an extension of the discovery period is necessary and appropriate to complete necessary depositions of Plaintiffs and witnesses.

9.

Accordingly, the parties respectfully request a three-month extension of the discovery period until October 8, 2025.

Respectfully submitted on May 28, 2025.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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## CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

*/s/ Jonathan S. Tonge*

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